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*Attorneys for Pacific Seafood Defendants*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

PACIFIC SEAFOOD PROCUREMENT, LLC,  
et al.,

Defendants.

Case No. 3:23-cv-01098-AGT

**DECLARATION OF ALEX VAN  
RYSELBERGHE IN SUPPORT OF  
PACIFIC SEAFOOD'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5**

Judge: The Honorable Alex G. Tse

1 I, Alex Van Rysselberghe, declare as follows:

2 1. I am a member of the Bar of the State of Oregon and am admitted *pro hac vice* to  
3 practice before this Court in this matter. I am an attorney in the law firm Stoel Rives LLP,  
4 counsel for Defendants Pacific Seafood Procurement, LLC; Pacific Seafood Processing, LLC;  
5 Pacific Seafood Fleet, LLC; Pacific Seafood Distribution, LLC; Pacific Seafood USA, LLC,  
6 Dulcich, Inc.; Pacific Seafood – Eureka, LLC; Pacific Seafood – Charleston, LLC; Pacific  
7 Seafood – Warrenton, LLC; Pacific Seafood – Newport, LLC; Pacific Seafood – Brookings,  
8 LLC; Pacific Seafood – Westport, LLC; Pacific Surimi – Newport, LLC (collectively,  
9 “Defendants” or “Pacific”) in this matter. I have personal knowledge of the facts set forth in this  
10 declaration and, if called to testify as a witness, could and would do so competently.

11 2. I submit this Declaration in support of Pacific Seafood’s Administrative Motion to  
12 Consider Whether another Party’s Material Should be Sealed Pursuant to Civil Local Rules 7-11  
13 and 79-5.

14 3. Attached hereto as Exhibit 1 is an unredacted true and correct copy of Exhibit D to  
15 the Declaration of Matthew D. Segal in Support of Pacific Seafood’s Motion to Compel  
16 Nonparties Ozzie Gregorio and Triple G Seafood to Comply with Subpoena (“Segal  
17 Declaration”).

18 4. Attached hereto as Exhibit 2 is an unredacted true and correct copy of Pacific  
19 Seafood’s Motion to Compel Nonparties Ozzie Gregorio and Triple G Seafood to Comply with  
20 Subpoena (“Motion to Compel”).


21 5. The basis for sealing Exhibit D to the Segal Declaration, and the parts of the  
22 Motion to Compel that quote Exhibit D to the Segal Declaration, both filed on November 10,  
23 2025, is that the content of Exhibit D is designated as Confidential by nonparties Ozzie Gregorio  
24 and Triple G Seafood (collectively, “Gregorio”), pursuant to the Court’s June 26, 2024  
25 Stipulation and Protective Order (Dkt. No. 63).

26 6. Pacific takes the position that the identified material is not “privileged, protectable  
27 as a trade secret or otherwise entitled to protection under the law” pursuant to Civ. L.R. 79-5 and  
28

1 that the strong presumption of access to judicial records is supported under good cause or  
2 compelling reasonable standards.

3 7. Pacific takes the position that Gregorio's designation of the identified material is  
4 without basis and the Administrative Motion should be denied because they do not contain any  
5 confidential material or information.

6  
7 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
8 November 10, 2025.

9  
10   
11 Alex Van Rysselberghe